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10 Attorneys for GMAC MORTGAGE, LLC, its successors and/or assigns

11
12 UNITED STATES BANKRUPTCY COURT
13 DISTRICT OF NEVADA

14 In re
15 JOANNE PENNY,
16 Debtor(s).
17 Bankruptcy Case No. BK-S-08-18027-bam
18 Chapter 7
19 GMAC MORTGAGE, LLC'S REQUEST
20 FOR SPECIAL NOTICE AND SERVICE
21 OF PAPERS AND RESERVATION OF
22 RIGHTS

23 TO: UNITED STATES BANKRUPTCY JUDGE, THE DEBTOR(S), AND ALL

24 INTERESTED PARTIES

25 PLEASE TAKE NOTICE that the firm of PITE DUNCAN, LLP, attorneys for GMAC
26 Mortgage, LLC, its successors and/or assigns, hereby requests special notice of all events relevant
27 to the above-referenced bankruptcy and copies of all pleadings or documents filed in relation to the
28 above-referenced bankruptcy, including all pleadings or notices under Federal Rules of Bankruptcy
Procedure, Rule 2002, the commencement of any adversary proceedings, the filing of any requests
for hearing, objections, and/or notices of motion, or any other auxiliary filings, as well as notice of
all matters which must be noticed to creditors, creditors committees and parties-in-interest and other
notices as required by the United States Bankruptcy Code and Rules and/or Local Rules of the
above-referenced bankruptcy court.

1 PITE DUNCAN, LLP, requests that for all notice purposes and for inclusion in the Master
 2 Mailing List in this case, the following address be used:

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 4 ELSIE L. SECOQUIAN
 5 PITE DUNCAN, LLP
 6 4375 Jutland Drive
 7 Suite 200
 8 San Diego, CA 92117

9 Neither this Request for Special Notice nor any subsequent appearance, pleading, claim,
 10 proof of claim, documents, suit, motion nor any other writing or conduct, shall constitute a
 11 waiver of the within party's:

12 a. Right to have any and all final orders in any and all non-core matters entered only
 13 after de novo review by a United States District Court Judge;

14 b. Right to trial by jury in any proceeding as to any and all matters so triable herein,
 15 whether or not the same be designated legal or private rights, or in any case, controversy or
 16 proceeding related hereto, notwithstanding the designation or not of such matters as "core
 17 proceedings" pursuant to 28 U.S.C. § 157(b)(2)(H), and whether such jury trial right is pursuant
 18 to statute or the United States Constitution;

19 c. Right to have the reference of this matter withdrawn by the United States District
 20 Court in any matter or proceeding subject to mandatory or discretionary withdrawal; and

21 d. Other rights, claims, actions, defenses, setoffs, recoupments or other matters to
 22 which this party is entitled under any agreements at law or in equity or under the United States
 23 Constitution.

24 All of the above rights are expressly reserved and preserved by this party without
 25 exception and with no purpose of confessing or conceding jurisdiction in any way by this filing
 26 or by any other participation in these matters.

27 Dated: August 11, 2008

28 /s/ Elsie L. Secoquian
 4375 Jutland Drive
 Suite 200
 San Diego, CA 92117
 (702) 413-9692
 NV Bar #9685
 Attorney for GMAC MORTGAGE, LLC, its
 successors and/or assigns

1 CERTIFICATE OF SERVICE

2 I hereby certify that a copy of the foregoing REQUEST FOR SPECIAL NOTICE AND
3 SERVICE OF PAPERS AND RESERVATION OF RIGHTS was served on August 11, 2008.

4 Service was accomplished by the method and to the following as indicated:

5 BY ELECTRONIC NOTICE OR FIRST CLASS MAIL

6 Joanne Penny
4349 Soria Way
7 Las Vegas, NV 89121

8 Yvette Weinstein
6450 Spring Mtn Rd #14
9 Las Vegas, NV 89146

10 U.S. Trustee
Department of Justice
11 300 Las Vegas Boulevard. So.
Suite 4300
12 Las Vegas, NV 89101

13
14
15 I declare under penalty of perjury that the foregoing is true and correct and that this
16 declaration was executed on August 11, 2008, at San Diego, California.

17
18 /s/ Mary K. Arnold
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